

Kristen T. Gallagher (NSBN 9561)  
McDONALD CARANO LLP  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, Nevada 89102  
Telephone: (702) 873-4100  
kgallagher@mcdonaldcarano.com

Matthew P. Previn (admitted *pro hac vice*)  
PAUL HASTINGS LLP  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 318-6049  
matthewprevin@paulhastings.com

Michael Morrill (admitted *pro hac vice*)  
PAUL HASTINGS LLP  
71 S. Wacker Drive, 45<sup>th</sup> Floor  
Chicago, IL 60606  
Telephone: (312) 499-6064  
michaelmorrill@paulhastings.com

*Attorneys for Defendant  
Hometown Equity Mortgage LLC d/b/a theLender*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

IDAN U. EDRY, an individual, on behalf of  
himself and others similarly situated,

Plaintiff,

vs.

HOMETOWN EQUITY MORTGAGE, LLC, a  
Missouri limited-liability company, D/B/A  
THELENDER,

Defendants.

Case No: 2:22-cv-00804-MMD-VCF

**STIPULATION AND ORDER TO  
EXTEND DEFENDANT'S DEADLINE TO  
ANSWER PLAINTIFF'S CLASS ACTION  
COMPLAINT**

**(First Request)**

Defendant Hometown Equity Mortgage LLC d/b/a theLender (“theLender” or “Defendant”) and plaintiff Idan U. Edry (“Edry” or “Plaintiff”), by and through their attorneys, hereby agree, stipulate and respectfully request that the Court extend the deadline for theLender to answer Plaintiff’s Class Action Complaint (“Complaint”) from February 14, 2023, up to and including February 24, 2023. On January 31, 2023, the Court entered an Order granting in part and denying in part theLender’s motion to dismiss (ECF No. 34); therefore theLender’s answer or other response to the Complaint is currently due by February 14, 2023. Good cause exists for the extension as the

parties agree to permit the Lender additional time to prepare its answer. This is the first request to extend the deadline.

This request is being made in good faith and is not brought to delay litigation or prejudice any party. Therefore, the parties respectfully request that the Lender's deadline to answer or otherwise respond to the Complaint be extended from February 14, 2023, up to and including February 24, 2023.

Dated: February 10, 2023.

McDONALD CARANO LLP

WOLF, RIFKIN, SHAPIRO, SCHULMAN &  
RABKIN, LLP

By: /s/ Kristen T. Gallagher

By: /s/ Royi Moas

Kristen T. Gallagher (NSBN 9561)  
McDONALD CARANO LLP  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, Nevada 89102  
Telephone: (702) 873-4100  
kgallagher@mcdonaldcarano.com

Royi Moas (NSBN 10686)  
Daniel Bravo (NSBN 13078)  
3773 Howard Hughes Parkway  
Suite 590 South  
Las Vegas, Nevada 89169  
Telephone: (702) 341-5200  
rmoas@wrslawyers.com  
dbravo@wrslawyers.com

Matthew P. Previn (admitted *pro hac vice*)  
PAUL HASTINGS LLP  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 318-6049  
matthewprevin@paulhastings.com

Jason J. Thompson (admitted *pro hac vice*)  
Kevin J. Stoops (admitted *pro hac vice*)  
David R. Parker (admitted *pro hac vice*)  
SOMMERS SCHWARTZ, P.C.  
One Town Square, Suite 1700  
Southfield, Michigan 48076  
Telephone: (248) 355-0300  
jthompson@sommerspc.com  
kstopps@sommerspc.com  
dparker@sommerspc.com

Michael Morrill (admitted *pro hac vice*)  
PAUL HASTINGS LLP  
71 S. Wacker Drive, 45<sup>th</sup> Floor  
Chicago, IL 60606  
Telephone: (312) 499-6064  
michaelmorrill@paulhastings.com

*Attorneys for Plaintiff Idan U. Edry and  
Putative Class Members*

*Attorneys for Defendant  
Hometown Equity Mortgage LLC d/b/a  
theLender*

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

2-14-2023  
DATED: \_\_\_\_\_